

Cullen and Dykman LLP 80 State Street, Suite 900 Albany, New York 12207

CHRISTOPHER E. BUCKEY PARTNER DIRECT: (518) 788-9406 CBUCKEY@CULLENLLP.COM

October 28, 2024

VIA ECF-PACER

Magistrate Judge Miroslav Lovric United States District Court Northern District of New York Federal Building and U.S. Courthouse 15 Henry Street Binghamton, New York 13901

Re: Adirondack Trust Company v. Maha Laxmi Corp., et. al.

1:21-cv-01334-DNH-ML (N.D.N.Y.)

Dear Judge Lovric:

This firm represents Plaintiff Adirondack Trust Company ("<u>ATC</u>") in the above-referenced matter. We write in accordance with the Court's October 25, 2024 directive to provide a status letter regarding the editing of ATC's Wikipedia page (Dkt. 111).

Counsel for the parties met and conferred this morning. We understand that Defendants will provide a sworn affidavit from Niral Patel denying that he, or anyone on his behalf, made the Wikipedia edits set forth in our October 25, 2024 correspondence (Dkt. 111). Upon receipt of that sworn affidavit, ATC will determine whether it will request permission to serve a subpoena on Wikipedia and/or to seek a forensic examination of Mr. Patel's devices.

Additionally, as we discussed with Defendants' counsel this morning, ATC will begin the process of correcting the false information added to its Wikipedia page. If necessary, ATC will state to Wikipedia that it believes the incorrect information was provided by or on behalf of Mr. Patel, a disgruntled litigant.

Please contact me if the Court has any questions.

Respectfully,

Christopher E. Buckey

FOUNDED 1850

October 28, 2024 Page No.: 2

cc: All Counsel of Record (via ECF-PACER)